



APPENDIX A – SUBMISSIONS REGISTER – ORGANISATION AND COMMUNITY SUBMISSIONS

Community Groups / Organisations

Submission No.	Group	Section where issues addressed in Submission Report
1.	Culburra Residents and Ratepayers Action Group (CRRAG)	• Modification is not minor; impacts exceed realignment of development footprint (Issues: 3, 5, 21) • Opposition to changing baseline definition from “works” to “construction”; undermines pre-construction environmental data and EPBC Act protections (Issues: 5, 4, 12, 16) • Opposition to amendment of Condition A9 regarding lapse of consent; prevents due process and indefinite consent extension (Issues: 5, 21) • Stormwater basin layouts and sizes remain inadequate; rely on outdated, uncalibrated, incomplete rainfall and climate data (Issues: 11, 15, 16) • Independent, updated modelling by qualified engineers required before approval (Issues: 11, 15, 16, 21) • Incorrect flood modelling risks inundation of new housing and pollution of sensitive waterways (Lake Wollumboola, Crookhaven River) (Issues: 15, 16, 13, 21) • Failure to account for future climate change, high tides, and local hydrology (Issues: 11, 15, 16, 21) • Recommendation to reject modification and maintain original consent conditions to protect community and environment (Issues: 3, 5, 12, 16, 21)
	CRRAG – Appendix C Prepared by Dr Sarah Waddell	• Modification seeks to alter LEC-imposed conditions without justification (Issues: 5, 21, 23) • Changes to “baseline” definition would allow early works before required monitoring (Issues: 5, 21) • Altering Condition A9 could enable indefinite consent extension (Issues: 5, 21) • Weakens alignment with EPBC Act and risks non-compliance (Issues: 2, 5, 21, 23) • Undermines scientific validity of water, ecology, and aquaculture monitoring (Issues: 5, 12, 21) • Recent early-works DAs highlight risk of proceeding without baseline data (Issues: 5, 21)

Submission No.	Group	Section where issues addressed in Submission Report
		Recommend rejection of modifications and retention of original consent wording (Issues: 5, 21)
2.	Jerrinja Local Aboriginal Land Council – Alfred Wellington	This submission and consideration of Aboriginal Cultural Heritage is addressed in the response from Austral Archaeology (Appendix X). - Modification is not minor; requires more rigorous assessment (Issues: 3, 5, 21) - Removal of requirement to consult Jerrinja LALC (Clause 12) (Issues: 7, 14) - Consultation with off-country Aboriginal Parties inappropriate; risks cultural harm (Issues: 7, 14) - Existing Aboriginal Cultural Heritage Assessment (ACHA) and Management Plan (ACHMP) inadequate for modified disturbance area (Issues: 14, 16) - Increased clearing beyond EPBC approval (grey-headed flying fox habitat, 47.64 ha vs 45.99 ha approved) (Issues: 12, 16, 5, 23) - Offsets proposed may be insufficient and require independent assessment (Issues: 12, 16, 5) - Changing baseline from “works” to “construction” undermines environmental controls and ecological data collection (Issues: 5, 4, 12, 16) - Condition A9 amendment removes lapse safeguard; permits indefinite consent extension (Issues: 5, 21) - Requirement for independent, approved staging plans unclear (Issues: 3, 5, 21) - Overall concern: modification threatens cultural heritage, ecological values, and procedural integrity (Issues: 14, 12, 21)

Community Submissions

Submission Number	First Name	Last Name	Suburb	Issue
3.	Withheld	Withheld	Hurlstone Park	• Stormwater runoff from dwellings and sealed roads would increase pollutants, sediments, and nutrients in Lake Wollumboola and Crookhaven River (Issues: 15,16) • Risk to oyster industry from potential contamination; could devastate leases, jobs, and families (Issues: 13) • Lake Wollumboola is ecologically significant, supports migratory species, saltmarsh, seagrass, mangroves, and unsuitable for large-scale urban development (Issues: 12,16) • Clearing bushland threatens habitat for threatened species, fragments ecosystems, reduces post-fire biodiversity resilience (Issues: 16) • Single road access creates safety and evacuation risks during bushfires or floods (Issues: 2, 9) • Increased traffic congestion from thousands of additional vehicle movements (Issues: 2,9) • Local health services at capacity; emergency services response delayed by congestion (Issues: 2) • Strain on shops, schools, beaches, and local amenities reduces liveability (Issues: 2,10) • Aboriginal cultural heritage not assessed; no consultation or archaeological investigation undertaken (Issues: 14) • Loss of village character; high-density, suburban form inconsistent with Culburra's coastal identity (Issues: 1, 10) • Development relies on outdated Shoalhaven LEP 1985 rather than modern frameworks and Sensitive Urban Lands Review recommendations (Issues: 20) • Shoalhaven Council and expert advice on stormwater, foreshore protection, open space, connectivity, and staging ignored or unresolved (Issues: 3, 11, 15, 8) • Irreversible environmental and social impacts through permanent loss of bushland, polluted waterways, collapse of oyster industry, destruction of cultural sites (Issues: 11, 13, 14, 16) • Short-term housing or commercial gains do not outweigh permanent losses (Issues: 18, 19)

Submission Number	First Name	Last Name	Suburb	Issue
				Future planning should protect sensitive environmental areas, respect the Sensitive Urban Lands Review, involve Aboriginal consultation, and maintain low-density, coastal village character (Issues: 1, 10, 20, 21)
4.	Withheld	Withheld	Culburra Beach	- Water quality modelling uncalibrated, not peer reviewed, does not consider climate change; underestimates runoff and pollution loads (Issues: 11, 15, 20) - Outdated rainfall data used; does not accurately represent site conditions or coastal climate (Issues: 11, 15) - Proposed water quality ponds located within or near 1% AEP flood zone; likely inundation during major storm events (Issues: 11, 15, 16) - Flooding could resuspend captured sediments and nutrients, reducing treatment efficiency and impacting downstream water quality (Issues: 19, 16, 15) - Pond design lacks elevation, protective features, overflow pathways, and redundancy; vulnerable under future climate scenarios (Issues: 11, 15, 21) - Biofiltration systems (A and C) within flood zone; inundation may bypass filtration media, reducing effectiveness (Issues: 11, 15) - Flood-prone systems require frequent maintenance and sediment removal (Issues: 11, 21) - Hard surfaces will increase stormwater, sediment loads, and freshwater flows downstream (Issues: 2, 11, 15) - Water quality treatment devices at low-lying sites risk inundation from flood events and sea level rise, discharging directly into Crookhaven Estuary (Issues: 15, 16, 11, 13) - Potential irreversible impacts to two highly sensitive waterways; inadequate design may result in ongoing environmental and financial burdens (Issues: 16, 13, 21, 11)
5.	ANDREW	JAKUBOWICZ	Culburra Beach	- Minor amendments mask serious inadequacies (Issues: 3, 10, 21) - Incorrect environmental and water data; onsite water treatment likely to flood, causing pollution (Issues: 11, 15, 16) - Five-year commencement extension unacceptable (Issues: 5, 21) - Request full reassessment of environmental impacts (Issues: 3, 5, 21)
6.	Withheld	Withheld	Culburra Beach	- Baseline must remain defined as before any works (Issues: 3, 4, 5) - Condition A9 must require physical commencement (Issues: 5, 21)

Submission Number	First Name	Last Name	Suburb	Issue
				Water management issues need independent modelling and correct data (Issues: 11, 15, 16)
7.	Withheld	Withheld	Culburra Beach	- Baseline must remain defined as before any works (Issues: 3, 4, 5) - Condition A9 must require physical commencement (Issues: 5, 21) - Water management issues need independent modelling and correct data (Issues: 11, 15, 16)
8.	Lani	Imhof	Vincentia	- Opposes modification of LEC (2021) and EPBC Act (2025) conditions (Issues: 5, 21, 23) - Baseline must remain before any works (Issues: 3, 4, 5) - Condition A9 must remain (Issues: 5, 21) - Stormwater/water management modelling must be independently reviewed using local data (Issues: 11, 15, 16)
9.	Aleisha	O'Connor	Bondi Junction	- Definition of baseline must remain before any works (Issues: 3, 4, 5) - Condition A9 must remain (Issues: 5, 21) - Stormwater management based on outdated and incomplete data (Issues: 11, 15) - Independent updated modelling required (Issues: 11, 15, 16) - Modifications are not minor (Issues: 11, 15)
10.	Withheld	Withheld	Orient Point	- Baseline before work (Issues: 5, 4, 3) - Condition A9 must remain (Issues: 5, 21) - Stormwater management requires independent updated modelling (Issues: 11, 15, 16) - Modifications not minor (Issues: 3, 5, 21)
11.	Claire	Haywood	Culburra Beach	- Baseline must remain before works (Issues: 5, 4, 3) - Condition A9 must remain (Issues: 5, 21) - Stormwater modelling outdated and uncalibrated (Issues: 11, 15) - Local flooding history and risks to waterways (Issues: 15, 16, 13) - Modifications are not minor and undermine environmental protections (Issues: 3, 5, 21)
12.	Withheld	Withheld	Culburra Beach	- Baseline before works (Issues: 5, 4, 3) - Condition A9 must remain (Issues: 5, 21) - Stormwater/flood modelling requires independent review (Issues: 11, 15, 16) - Modifications materially alter protections (Issues: 3, 5, 21)

Submission Number	First Name	Last Name	Suburb	Issue
13.	Withheld	Withheld	Sydney Olympic Park	• Opposes deletion of “current natural state” in ecological restoration (Issues: 12, 16) • Increased bushland destruction (~7%) (Issues: 12, 16) • No justification or alternatives considered (Issues: 4, 6, 5) • Edge effects from development could worsen impacts (Issues: 12, 16) • Mitigation measures recommended for western boundary (Issues: 12, 16, 21)
14.	Withheld	Withheld	Culburra Beach	• Baseline before work (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater management requires independent updated modelling (Issues: 11, 15) • Modifications not minor (Issues: 11, 15)
15.	Krystyna	George	Erskineville	• Sewerage system already failing (Issues: 5, 4, 3) • Baseline redefinition unacceptable • Condition A9 weakening unacceptable (Issues: 5, 21) • Stormwater management based on outdated data (Issues: 11, 15) • Request reassessment and infrastructure upgrades
16.	Withheld	Withheld	Culburra Beach	• Baseline before work (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater management requires independent updated modelling (Issues: 11, 15, 16) • Modifications not minor (Issues: 3, 5, 21)
17.	Rebecca	Sleath	Culburra Beach	• Entire development is environmentally, culturally and climatically inappropriate for Culburra; conflicts with regional planning (Issues: 1, 6, 20) • Water/runoff management inadequately verified; no independent verification of developer modelling; risk of treatment failure and downstream pollution (Issues: 11, 15, 16) • Flood planning levels in MOD Report Appendix L are outdated; modelling must use Shoalhaven’s March 2023 flood planning levels and current data (Issues: 15, 11) • Changing baseline from “works” to “construction” is unacceptable — undermines pre-works baseline data and EPBC/LEC protections (Issues: 5, 4, 12, 16, 23) • Proposed amendments to consent (including altering Environmental Auditor to Environmental Representative) unlawfully weaken safeguards and enable cherry-picked oversight (Issues: 5, 21)

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				- Allowing amendments to conditions imposed by LEC/EPBC is inappropriate for a footprint realignment and risks bypassing legal protections (Issues: 5, 21, 23) - Climate change, sea-level rise and local hydrology must be accounted for in all modelling and approvals (Issues: 15, 16, 11) - Submission asks DPHI to reject modification, uphold original consent conditions, and require comprehensive independent re-assessment of water management before any approval (Issues: 3, 5, 11, 15, 21)
18.	Karyn	Knowles	Culburra Beach	- Baseline must remain before works – Condition A9 must remain (Issues: 5, 21, 3, 4) - Water management must use independent analysis and suitable data (Issues: 11, 15, 16) - First Nations heritage, biodiversity, climate change, and precautionary principle (Issues: 12, 14, 16, 11, 15)
19.	Kingston	Anderson	Culburra Beach	- Baseline before works (Issues: 5, 4, 3) - Condition A9 must remain (Issues: 5, 21) - Stormwater modelling outdated (Issues: 11, 15) - Modifications materially alter protections (Issues: 3, 5, 21)
20.	Cindy	Jones	Jaspers Brush	- Baseline before works (Issues: 5, 4, 3) - Condition A9 extension unacceptable (Issues: 5, 21) - Stormwater modelling outdated (Issues: 11, 15) - Risk to waterways and ecosystems (Issues: 16, 13, 12) - Independent updated modelling required (Issues: 11, 15, 16)
21.	Paul	Godsell	Culburra Beach	- Baseline before works (Issues: 5, 4, 3) - Condition A9 must remain (Issues: 5, 21) - Stormwater modelling outdated (Issues: 11, 15) - Independent updated modelling required (Issues: 11, 15, 16) - Modifications not minor, risk to ecosystems (Issues: 3, 5, 12, 16)
22.	Withheld	Withheld	Culburra Beach	- Baseline before works (Issues: 5, 4, 3) - Condition A9 must remain (Issues: 5, 21) - Stormwater modelling outdated (Issues: 11, 15) - Independent updated modelling required (Issues: 11, 15, 16) - Modifications materially alter protections (Issues: 3, 5, 21)
23.	Penny	Smith	Culburra Beach	- Extension of 5-year consent period unacceptable (Issues: 5, 21) - Baseline redefinition unacceptable (Issues: 5, 4, 3)

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				• Modifications undermine approval protections (Issues: 3, 5, 21)
24.	Suzanne	McCarthy	Belfield	• Baseline before works (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater modelling outdated (Issues: 11, 15) • Independent updated modelling required (Issues: 11, 15, 16) • Modifications not minor (Issues: 3, 5, 21)
25.	Melanie	Wells	Orient Point	• Baseline before works (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater modelling outdated – Independent updated modelling required (Issues: 11, 15, 16) • Modifications materially alter protections (Issues: 3, 5, 21)
26.	Will	Mrongovius	Paddington	• Concerns with amendments to Environmental Performance Conditions (Conditions 8(e) & 9 B8) refer to IWCMS without specifying date or version (Issues: 11, 21) • Conditions 14, 15, 16 – park labels used but park sizes not retained; removes enforceability of conditions (Issues: 2) • Opposition to development on south side of Culburra Road (Issues: 22) • RE1 – Transfer Station should be excluded; existing facility nearby (Issues: 22) • Unclear structure opposite entry road in Lot 5(c) (Issues: 22)
27.	Patrice	Wills	Culburra Beach	• Baseline before works (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater management relies on outdated, uncalibrated data (Issues: 11, 15) • Independent updated modelling required (Issues: 11, 15, 16) • Modifications not minor; risk to waterways and ecosystems (Issues: 3, 5, 12, 16)
28.	Gregory	Waters	Culburra Beach	• Baseline must remain as before any works, not just construction (Issues: 5, 4, 3) • Condition A9 must remain; indefinite extensions unacceptable (Issues: 5, 21) • Stormwater management must rely on independent, updated modelling using current coastal data (Issues: 11, 15, 16) • Protect Curley's Bay, Lake Wollumboola, and Crookhaven River (Issues: 15, 16, 13)
29.	Ned	Waters-Wills	Culburra Beach	• Definition of baseline must remain pre-construction to protect ecosystems and endangered species (Issues: 5, 4, 12, 16) • Condition A9 must remain; prevents bypassing council/community oversight (Issues: 5, 21)

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				- Stormwater basin changes require independent review using up-to-date local data (Issues: 11, 15, 16) - Modifications are not minor (Issues: 3, 5, 21)
30.	Samuel	Cooper	Fairy Meadow	This submission and consideration of biodiversity impacts is addressed in the response from EcoLogical Australia (Appendix X). - Biodiversity Development Assessment Reports (BDARs) are non-compliant with BAM 2020 and Biodiversity Conservation Act 2016 (Issues: 4, 12) - Inadequate threatened species surveys, impact avoidance, mitigation, and offsets (Issues: 12, 16) - Consent must be refused due to incomplete environmental documentation (Issues: 4, 5, 21)
31.	Withheld	Withheld	Mangerton	- Baseline must remain before any works (Issues: 5, 4, 3) - Condition A9 must remain (Issues: 5, 21) - Independent, updated stormwater and flood modelling required before water management approval (Issues: 11, 15, 16)
32.	Rebecca	Sleath	Culburra Beach	- Development threatens native forest, cultural heritage, climate resilience, and regional planning objectives (Issues: 12, 14, 16, 6) - Stormwater modelling is outdated and unreliable; independent verification required (Issues: 11, 15, 16) - Baseline definition and Environmental Auditor conditions must be upheld (Issues: 5, 21) - Modifications threaten environmental protections and public safety (Issues: 3, 5, 12, 16, 9)
33.	Jannette	Donney	Orient Point	- Baseline must remain as before any works (Issues: 5, 4, 3) - Condition A9 must require physical commencement (Issues: 5, 21) - No water management conditions should be approved until independent modelling is complete (Issues: 11, 15, 16)
34.	Lucy	Robertson	Culburra Beach	- Modifications are not minor (Issues: 3, 5, 21) - Concerns based on expert advice from engineers, planners, and lawyers (Issues: 7, 4, 11) - Ongoing failure of developer to genuinely consult the community (Issues: 7, 6)

Submission Number	First Name	Last Name	Suburb	Issue
35.	Sarah	Waddell	Wattamolla	• Modifications go beyond realignment; risk conflicting with LEC and EPBC Act conditions (Issues: 5, 21, 23) • Environmental protection measures must be preserved (Issues: 12, 16, 11, 15)
36.	Elizabeth	Seymour	Culburra Beach	• Stormwater management relies on uncalibrated and outdated rainfall data (Issues: 11, 15) • Modifications weaken baseline protections and expiry safeguards (Issues: 5, 21) • Independent, updated modelling required before approval (Issues: 11, 15, 16)
37.	Narelle	Wright	Culburra Beach	• Baseline data must be collected before any works/construction (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater basin designs outdated; independent review required (Issues: 11, 15, 16) • Protect Lake Wollumboola, Crookhaven Estuary, and Curley's Bay ecosystems (Issues: 15, 16, 13)
38.	Anna	Smallwood	Culburra Beach	• Development too large and dense for sensitive coastal area (Issues: 1, 10, 12) • Significant loss of habitat, threats to Crookhaven River catchment (Issues: 12, 13, 16) • Poor design, small blocks, inadequate environmental mitigation (Issues: 1, 11, 12) • Lack of genuine consultation with Aboriginal stakeholders and community (Issues: 7, 14)
39.	Alan	Wright	Culburra Beach	• Changing baseline from "works" to "construction" undermines court and government determinations (Issues: 5, 21) • Condition A9 lapse rules must remain (Issues: 5, 21) • Existing stormwater/sewerage systems inadequate; independent assessment required (Issues: 2, 11, 15, 21) • Developer has poor compliance history (Issues: 2, 21)
40.	Emma	Hood	Culburra Beach	• Impacts on: ◦ Environmental impacts on endangered species (Issues: 12, 16) ◦ Cultural heritage (Issues: 14) ◦ Township character (Issues: 1, 10) • Minor relocations/reductions insufficient (Issues: 1, 5, 12) • Development undermines tourism and community amenity (Issues: 10, 18, 19) • Submissions are ignored; approval processes perceived as predetermined (Issues: 7, 21)

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41.	Stuart	Lind	Culburra Beach	• Baseline must remain pre-works (Issues: 5, 4, 3) • Condition A9 lapse rules must remain; prevent indefinite consent extension (Issues: 5, 21) • Stormwater management based on outdated, uncalibrated data (Issues: 11, 15) • Independent, updated modelling required (Issues: 11, 15, 16) • Modifications are not minor and threaten waterways and ecosystems (Issues: 3, 5, 12, 16)
42.	Withheld	Withheld	Orient Point	• Baseline must remain pre-works (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater management requires independent, updated modelling (Issues: 11, 15, 16) • Modifications materially alter protections (Issues: 3, 5, 21)
43.	Robert	Martin	Culburra Beach	• Too many houses proposed; insufficient infrastructure (Issues: 2, 10) • Reduces village character (Issues: 1, 10) • Lower-cost housing is limited (Issues: 18, 19) • Locals must move for employment (Issues: 18, 19) • Modifications worsen congestion and community issues (Issues: 2, 10, 21)
44.	Withheld	Withheld	Culburra Beach	• Baseline must remain pre-works (Issues: 5, 4, 3) • Condition A9 must remain (Issues: 5, 21) • Stormwater and flood modelling must be independent and updated (Issues: 11, 15, 16) • Modifications are not minor; risk to waterways and ecosystems (Issues: 3, 5, 12, 16)